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REMARKS

Claims 1-12 are pending in the application. Claims 1-12 have been rejected.

Applicants provide a method for mapping business and engineering processes. According to this method, users (e.g., users 460d, e, f in FIG. 8b) are given access to a system for generating an emergent model. The users generate models (e.g., ref. nos. 450, 452, 454) that include one or more data objects and/or function objects. (FIG. 8b; Specification, page 20, lines 16-17.) Inputs and/or outputs of the data objects and/or function objects are then independently published and subscribed to from computing devices on a computer network. In this way, a network of linked data objects and/or function objects emerges to form an emergent model (e.g., ref. no. 456), or "a model that is created without a predefined or global definition. (Specification as originally filed, page 4, lines 10-11.) Finally, the network of linked inputs and/or outputs are analyzed to produce a map of the business and engineering processes.

Independent claim 1 is being amended to include all the limitations described above ("independently publishing...inputs and/or outputs of data objects and/or function objects...independently...subscribing to the published inputs and/or outputs...thereby creating a network of linked inputs and/or outputs of data objects and/or function objects, without a predefined or global definition"). These amendments are supported by the specification as originally filed at page 4, lines 10-11, page 16, lines 27-28, page 20, lines 17-18, and page 23, lines 3-5.

Claims 1-7, 9, and 11 have been rejected under 35 U.S.C. 103(a) as being unpatentable over prior art of record, "Modeling and Evaluation of Product Design Problems in a Distributed Design Environment" by Pahng et al. (hereinafter "Pahng") in view of U.S. Pat. No. 6,898,791 to Chandy et al. (hereinafter "Chandy").

As stated in the present Office Action at page 8, "Pahng does not expressly disclose a network that is created in a manner free of a central coordinating computing device." In addition, Pahng does not teach or suggest an emergent model or a model that is created without a predefined or global definition as claimed in now amended claim 1. Pahng instead teaches a Distributed Object-based Modeling and Evaluation (DOME) framework in which "[t]he model of a design problem is created by decomposing the problem into modules and defining how modules are related to one another." (Pahng,

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page 7, column 2.) In other words, Pahng teaches a model that is created from a predefined definition of a design problem. Moreover, Pahng does not teach or suggest modules that independently publish or subscribe to the inputs and/or outputs of other modules as claimed in now amended claim 1. In Pahng, the modules are interconnected based on the predefined definition of the design problem. Therefore, Pahng does not teach or suggest creating a model without a predefined or global definition by independently publishing and subscribing to inputs and/or outputs of data objects and/or function objects.

Chandy describes "a framework for a distributed system [with peer-to-peer process communications] that implements distributed applications over world-wide networks." Col. 3, lines 63-66 and col. 4, lines 9-11. According to Chandy's distributed system framework, a single process object initiates a virtual or personal network by sending messages from its outbox to the inboxes of a collection of process objects with which it needs to collaborate on a given task. (See, for example, col. 16, lines 46-52.) These messages request that the process objects in the collection of process objects connect to other process objects in the collection. Once the personal network is established, the given task is performed by passing messages among the process objects in the personal network. (See Abstract.) When the given task is completed, the personal network is terminated. (See, for example, col. 16, lines 60-63.)

As with Pahng, however, Chandy does not teach or suggest creating an emergent model or creating a model without a predefined or global definition by independently publishing and subscribing to inputs and/or outputs of data objects and/or function objects. As described above, the Chandy framework requires that a single process object initiate a personal network with other process objects with which it desires to collaborate on a predefined task. Thus, before a single process object can initiate a personal network, it must define both the participants in the personal network and the task to be completed. Therefore, Chandy does not teach or suggest creating a model without a predefined or global definition.

Applicants also point out that one having ordinary skill in the art would not even consider combining these references because they are directed to very different problems. Pahng is directed to the modeling of a product design problem in a distributed environment. (Pahng, page 6, columns 1-2.) In contrast, Chandy is directed to a

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distributed system framework for establishing a personal network between process objects to perform at least one task by passing messages between process objects. Chandy nowhere even suggests applications relating to distributed models for a product design problem. The references are similar only insofar as they discuss distributed systems.

Because neither Chandy nor Pahng, alone or in combination, teach or suggest creating an emergent model or creating a model <u>without a predefined or global definition</u> by <u>independently</u> publishing and subscribing to inputs and/or outputs of data objects and/or function objects as claimed in now amended independent claim 1 ("<u>independently</u> publishing...inputs and/or outputs of data objects and/or function objects...<u>independently</u>...subscribing to the published inputs and/or outputs...thereby creating a network of linked inputs and/or outputs of data objects and/or function objects, <u>without a predefined or global definition</u>"), Applicants respectfully request that the §103 rejection of claim 1 be withdrawn.

Since claims 2-7, 9, and 11 depend from and include the limitations of base claim 1, Applicants respectfully request that the §103 rejection of claims 2-7, 9, and 11 be withdrawn for at least the same above reasons.

Claim 8 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Pahng and Chandy as applied to claim 1, and further in view of "Web based collaborative visualization of distributed and parallel simulation" by Bajaj et al. (hereinafter "Bajaj").

Claim 8 depends from base claim 1. Pahng and Chandy are argued above and those arguments similarly apply here. Bajaj does not add to Pahng or Chandy the claimed ("<u>independently</u> publishing...inputs and/or outputs of data objects and/or function objects...<u>independently</u>...subscribing to the published inputs and/or outputs...thereby creating a network of linked inputs and/or outputs of data objects and/or function objects, <u>without a predefined or global definition</u>") of the present invention. Since the prior art references (Pahng, Chandy, and Bajaj) when combined do not teach, suggest or otherwise make obvious all the claim limitations of now amended base claim 1, Applicants respectfully request that the §103 rejection of claim 8 be withdrawn.

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Claims 10 and 12 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Pahng and Chandy as applied to claim 1, and further in view of "Firewalls Complete" by Goncalves.
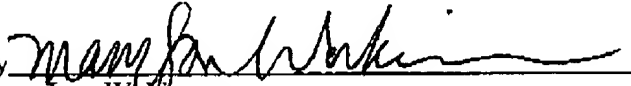
Claims 10 and 12 depend from base claim 1. Pahng and Chandy are argued above and those arguments similarly apply here. Goncalves does not add to Pahng or Chandy the claimed "independently publishing...inputs and/or outputs of data objects and/or function objects...independently....subscribing to the published inputs and/or outputs...thereby creating a network of linked inputs and/or outputs of data objects and/or function objects, without a predefined or global definition." of the present invention. Since the prior art references (Pahng, Chandy, and Goncalves) when combined do not teach or suggest all the claim limitations of now amended base Claim 1, Applicants respectfully request that the rejections of claims 10 and 12 be withdrawn.

CONCLUSION

In view of the above amendments and remarks, it is believed that all claims (Claims 1-12) are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

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